

## Representation

### Draft Modification Report

#### 0348 - NTS Optional Commodity tariff – update to application rules

**Consultation close out date:** 11 March 2011

**Respond to:** [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

**Organisation:** **RWE Npower plc / RWE Supply & Trading GmbH**

**Representative:** Charles Ruffell

**Date of Representation:** 10 March 2011

#### Do you support or oppose implementation?

Support *delete as appropriate*

#### Please summarise (in one paragraph) the key reason(s) for your support/opposition.

We support the principles behind the NTS Optional Commodity tariff and agree that the proposed changes to the definition of "distance from the Specified Exit point to the Specified Entry Point" and removal of the option to request alternative allocations will improve the cost-reflectivity of the charge. The application of the NTS Optional Commodity tariff to storage exit points is an anomaly and eligibility of these sites should be removed.

#### Are there any new or additional issues that you believe should be recorded in the Modification Report?

No.

#### Relevant Objectives:

*How would implementation of this modification impact the relevant objectives?*

We agree that the proposal will have a positive impact on Code Relevant Objectives c) Efficient discharge of the licensee's obligations; d) Securing of effective competition and f) Promotion of efficiency in the implementation and administration of the Code.

#### Impacts and Costs:

*What analysis, development and ongoing costs would you face if this modification were implemented?*

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None.

**Implementation:**

*What lead-time would you wish to see prior to this modification being implemented, and why?*

We support 2 months notice and accept that 2 months is reasonable to undertake any analysis. Our preference would be for an October 1<sup>st</sup> implementation date.

**Legal Text:**

*Are you satisfied that the suggested legal text will deliver the intent of the modification?*

Yes, in particular the introduction of "Eligible Exit Point" to limit the eligibility of the NTS Optional Commodity tariff.

**Is there anything further you wish to be taken into account?**

*Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.*

No.